

EXHIBIT A

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STEVEN SHEPARD
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March 30, 2018

VIA FIRST CLASS MAIL

Marc LaGasse
645 Balmoral Lane,
Inverness, IL 60067

Andrea E. Petrungaro
965 W. Bombay Way,
Palatine, IL 60067

Re: Case 1:17-md-02800-TWT
IN RE: EQUIFAX, INC., Customer Data Security Breach Litigation

Dear Mr. LaGasse & Ms. Petrungaro:

We previously informed you that the Court appointed interim lead counsel to represent the class of persons affected by this data breach, and that we would no longer serve as your lawyers. I'm writing you again to let you know that I intend to formally withdraw our appearance as your lawyers in this case. I encourage you to contact the new lead counsel in this matter¹ with any questions or concerns about your rights in this case. I also want to inform you of the following:

(A) I, Steven M. Shepard, intend to file a motion to withdraw.

(B) Your case is number 1:17-md-02800-TWT, *IN RE: EQUIFAX, INC., Customer Data Security Breach Litigation*. The Clerk of the Court is James N. Hatten, his address is Richard B. Russell Federal Building, 2211 United States

¹ Consumer Plaintiffs Co-Lead Counsel: Kenneth S. Canfield, Amy E. Keller, Norman E. Siegel. Kenneth S. Canfield, Doffermyre Shields Canfield & Knowles, LLC, 1355 Peachtree Street, N.E. Suite 1600, Atlanta, Georgia 30309; Amy E. Keller, DiCello Levitt & Casey LLC, Ten North Dearborn Street, Eleventh Floor, Chicago, Illinois 60602; Norman E. Siegel, Stueve Siegel Hanson LLP, 460 Nichols Road, Suite 200, Kansas City, Missouri 64112

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Courthouse, 75 Ted Turner Drive, SW, Atlanta, GA 30303-3309; Telephone No.: (404) 215-1600. A list of the Opposing Counsel is attached.

(C) The Court that retains jurisdiction of the action is the United States District Court in the Northern District of Georgia.

(D) You have the burden of keeping the court informed respecting where notices, pleadings or other papers may be served. I believe that the appointed class counsel will perform these tasks for you but because I am withdrawing from the case, I will not have any further oversight.

(E) You have the obligation to prepare for trial or hire other counsel to prepare for trial when the trial date has been set. I believe that the appointed class counsel will perform these tasks for you but because I am withdrawing from the case, I will not have any further oversight.

(F) If you fail or refuse to meet these burdens, you may suffer adverse consequences.

(G) The last Case Management Order No. 3 filed by the court is attached, Document No. 248, filed 3/23/18. The dates of any scheduled proceedings, including trial, will not be affected by my withdrawal.

(H) Service of notices will be made on lead class counsel. Lead class counsel may contact you at your last known address above. It is also possible that you may receive notices at the addresses above.

(I) You have a right to object within fourteen (14) days of the date of this notice.

Sincerely,

A handwritten signature in black ink, appearing to read "S. M. Shepard", written in a cursive style.

Steven M. Shepard

Role	Client	Attorney	Pro Hac Vice	Terminated Firm	Domain	Email	Phone	Fax	Address
defendant	Equifax, Inc.	Alicia Bias Gilbert		King & Spalding			2125562100	2125562222	1185 Avenue Of The Americas; New York, NY 10036
defendant	Equifax, Inc.	Benjamin C. Jensen		Robinson & Cole			8602758236	8602758239	280 Trumbull Street; One Commercial Plaza; Hartford, CT 06103-3597
defendant	Equifax, Inc.	Charles Henry Carpenter	X	Pepper Hamilton-DC	carpenterlawfirmplc.com	carpenterl@carpenterlawfirm	2022201507		600 Fourteenth Street, N.W.; Washington, DC 20005-2004
defendant	Equifax, Inc.	Christopher J. Haugen		Messeri & Kramer, P.A.			6126723770	6126723777	100 South Fifth Street; 1400 Fifth Street Towers; Minneapolis, MN 55402
defendant	Equifax, Inc.	Daniel D. McGuire		Polsinelli PC			2146615580	2146615580	2950 N. Harwood Street, Suite 2100; Dallas, TX 75201
defendant	Equifax, Inc.	David Lewis Balser		King & Spalding, LLP-ATL 40	kslaw.com	dbalser@kslaw.com	4045724600	4045725100	40th Floor; 1180 Peachtree Street, NE; Atlanta, GA 30309-3521
defendant	Equifax, Inc.	Elizabeth Dees Adler		King & Spalding, LLP-ATL 40	kslaw.com	eadler@kslaw.com	4045723555		40th Floor; 1180 Peachtree Street, NE; Atlanta, GA 30309-3521
defendant	Equifax, Inc.	G. Gabriel Zorogastua		Lightfoot PC- MO			8163740537	8167531536	Suite 900; 900 W. 48th Place; Kansas City, MO 64112
defendant	Equifax, Inc.	Harlan Irby Prater, IV		Lightfoot Franklin & White, LLC	lightfootlaw.com	hprater@lightfootlaw.com	2055810720	2055810799	The Clark Building; 400 North 20th Street; Birmingham, AL 35203
defendant	Equifax, Inc.	Jayna Morse Cacioppo		Taft Stettinius & Hollister LLP			3177133582	3177133699	One Indiana Square; Suite 3500; Indianapolis, IN 46204
defendant	Equifax, Inc.	Joann Needelman		Clark Hill PLC - PA			2156408536	2156408501	One Commerce Square; 2005 Market Street; Suite 1000; Philadelphia, PA 19103
defendant	Equifax, Inc.	John R Lawless, Jr		King and Spalding LLP			2134434355	2134434310	633 West Fifth Street; Suite 1700; Los Angeles, CA 90071
defendant	Equifax, Inc.	John Christopher Toro		King & Spalding LLP - ATL	kslaw.com	jtoro@kslaw.com	4045722806		1180 Peachtree Street, NE, Atlanta, GA 30309-3521
defendant	Equifax, Inc.	John M. Williams		Rajkovich, Williams, Kilpatrick & True, I			8592451059	8592451231	Suite 375; 3151 Beaumont Center Circle; Lexington, KY 40513
defendant	Equifax, Inc.	Jordan S. Bolton		Clark Hill, PLLC			3139658300	3139658252	Suite 3500; 500 Woodward Avenue; Detroit, MI 48226
defendant	Equifax, Inc.	Joseph W. Lawver		Messeri & Kramer, P.A.			6126723770	6126723777	100 South Fifth Street; 1400 Fifth Street Towers; Minneapolis, MN 55402
defendant	Equifax, Inc.	Joseph Richard Wetzel		King & Spalding, LLP - SF CA			4153181200	4153181300	Suite 2300; 101 Second Street; San Francisco, CA 94105
defendant	Equifax, Inc.	Matthew Vernon Burrows		Gallagher Callahan & Gartrell PC			6035453643		214 N Main St; Concord, NH 03301
defendant	Equifax, Inc.	Wesley Anne Campbell		Jones Walker LLP			3025795700	3025795710	Miami Center; 201 South Biscayne Boulevard; Suite 2600; Miami, FL 33131
defendant	Equifax, Inc.	Molly Renee Hamilton Cawley		MHC Law, LLC			8432258651	8433522049	1250 Folly Road; Charleston, SC 29412
defendant	Equifax, Inc.	Noam B. Fischman		Polsinelli PC- DC			2022683630	2027833535	Suite 800; 1401 Eye Street, NW; Washington, DC 20009
defendant	Equifax, Inc.	Patricia Williams		Wiggins, Williams & Wiggins			5057648400	5057648685	PO Box 1306; Albuquerque, NM 87103-1306
defendant	Equifax, Inc.	Peter Corsale		POLSINELLI PC			3148898000	3142311776	100 S. Fourth Street; Suite 1000; St. Louis, MO 63102
defendant	Equifax, Inc.	Peter Isaiji	X	King & Spalding, LLP -NY	kslaw.com	pisaiji@kslaw.com	2125046579	2125046666	1185 Avenue of the Americas; New York, NY 10036
defendant	Equifax, Inc.	Phyllis Buchen Sumner		King & Spalding LLP - ATL	kslaw.com	psurner@kslaw.com	4045724799	4045725138	1180 Peachtree Street, NE; Atlanta, GA 30309-3521
defendant	Equifax, Inc.	Rachel M. Wertheimer		Verrill Dana, LLP - MA			2077744090	2077744499	P.O. Box 586; One Portland Square; Portland, ME 04112-0586
defendant	Equifax, Inc.	Ralph Downing Scott, III		Lax Vaughn Fortson Rowe Threest P.A.			5013766565	5013766666	11300 Cantrell Road; Suite 201; Little Rock, AR 72212
defendant	Equifax, Inc.	Robert Douglas Griest		King & Spalding LLP - ATL	kslaw.com	rgriest@kslaw.com	4045722824		1180 Peachtree St., N.E.; Atlanta, GA 30309-3521
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defendant	Equifax, Inc.	Stewart O. Peay		SNELL & WILMER LLP			8012571900		15 W SOUTH TEMPLE STE 1200; GATEWAY TOWER WEST; SALT LAKE CITY, UT 84101
defendant	Equifax, Inc.	Wesley B. Lockett		Lightfoot Franklin & White, LLC			2055810720	2055810799	The Clark Building; 400 North 20th Street; Birmingham, AL 35203
defendant	Equifax, Inc.	William O. Lockett, Jr.		Lockett Tyner Law Firm, P.A.			6626242591	6626257403	P.O. Box 1000; 143 Yazoo Avenue; Clarksdale, MS 38614
defendant	Equifax, Inc.	Arthur F. Hoge, III		Mee Mee Hoge & Epperson PLLP					
defendant	Equifax, Inc.	Brian C. Spahn		Godfrey & Kahn-Wi					
defendant	Equifax, Inc.	Kirkland E. Reid		Jones Walker LLP					
defendant	Equifax, Inc.	Timothy F. Campbell		Mee Mee Hoge & Epperson PLLP					
defendant	Equifax, Inc.	Vincent M. Roskovensky		Clark Hill PLC					
defendant	Does 1 through 50, inclusive								
defendant	Equifax Information Services LLC	Bradley Austin		Snell & Wilmer, LLP			7027845200	7027845252	3883 Howard Hughes Parkway; Las Vegas, NV 89169
defendant	Equifax Information Services LLC	Christopher J. Haugen		Messeri & Kramer, P.A.			6126723770	6126723777	
defendant	Equifax Information Services LLC	David Lewis Balser		King & Spalding, LLP-ATL 40	kslaw.com	dbalser@kslaw.com	4045724600	4045725100	
defendant	Equifax Information Services LLC	Jayna Morse Cacioppo		Taft Stettinius & Hollister LLP			3177133582	3177133699	
defendant	Equifax Information Services LLC	John R Lawless, Jr		King and Spalding LLP			2134434355	2134434310	
defendant	Equifax Information Services LLC	John Christopher Toro		King & Spalding LLP - ATL	kslaw.com	jtoro@kslaw.com	4045722806		
defendant	Equifax Information Services LLC	John M. Williams		Savell & Williams			4045211262		100 Peachtree Street; 1500 The Equitable Building; Atlanta, GA 30303
defendant	Equifax Information Services LLC	Jordan S. Bolton		Clark Hill, PLLC			3139658300	3139658252	
defendant	Equifax Information Services LLC	Joseph W. Lawver		Messeri & Kramer, P.A.			6126723770	6126723777	
defendant	Equifax Information Services LLC	Molly Renee Hamilton Cawley		MHC Law, LLC			8432258651	8433522049	
defendant	Equifax Information Services LLC	Rachel M. Wertheimer		Verrill Dana, LLP - MA			2077744090	2077744499	
defendant	Equifax Information Services LLC	Rita Bolt Barker		Wyche P.A.	wyche.com	swascom@wyche.com	8642428235		44 East Camperdown Way; Greenville, SC 29601-3512
defendant	Equifax Information Services LLC	Sidney Stewart Haskins, II		King & Spalding LLP - ATL	kslaw.com	shaskins@kslaw.com	4045724600	4045725100	
defendant	Equifax Information Services LLC	Vincent M. Roskovensky		Clark Hill PLC			4123947716	4123942555	14th Floor; One Oxford Centre; 301 Grant Street; Pittsburgh, PA 15219
defendant	Equifax Information Services LLC	William O. Lockett, Jr		Lockett Tyner Law Firm, P.A.			6626242591	6626257403	
defendant	Equifax Information Services LLC	Zachary Andrew McEntyre		King & Spalding, LLP-ATL 38	kslaw.com	zmcentyre@kslaw.com	4045724600		1180 Peachtree Street, NE; 38th Floor; Atlanta, GA 30309-3521
defendant	Equifax Information Services LLC	Patricia Williams		Wiggins, Williams & Wiggins					
defendant	Equifax Information Services LLC	Ralph Downing Scott, III		Lax Vaughn Fortson Rowe Threest P.A.					
defendant	Equifax Information Services LLC	Roger D. Rowe		Lax Vaughn Fortson Rowe Threest P.A.					
defendant	Equifax Information Solutions, LLC	Kirkland E. Reid		Jones Walker LLP			2514321414	2514397358	Suite 1200; 11 North Water Street; Mobile, AL 36602
defendant	Does 1 through 10								
defendant	Trusted ID, Inc						4153181200	4153181300	
defendant	Equifax Consumer Services, LLC	Joseph Richard Wetzel		King & Spalding, LLP- SF CA					
defendant	Charles Stimac, Jr.	Brian D. Flick		Brian D. Flick, Attorney at Law	dannlaw.com	bflick@dannlaw.com	2163730539		
defendant	Charles Stimac, Jr.	David H. Krieger		Haines and Krieger, LLC			7029805554	7023835518	
defendant	Charles Stimac, Jr.	George Haines		Haines and Krieger, LLC			7029805554		
defendant	Charles Stimac, Jr.	Marc Edward Dann		The Dann Law Firm Co. LPA	dannlaw.com	notices@dannlaw.com	2163730539	2163730536	
defendant	Charles Stimac, Jr.	Matthew I. Knepper		Knepper & Clark, LLC			7028256060	7024478048	
defendant	Charles Stimac, Jr.	Miles N. Clark		Knepper & Clark LLC	knepperclark.com	miles.clark@knepperclark.com	7028256060	7024478048	
defendant	Charles Stimac, Jr.	Robert A. Clifford		Clifford Law Offices, P.C.			3128990900	3125111160	
defendant	Charles Stimac, Jr.	Sean N. Payne		Payne Law Firm, LLC			7029252733	7024622727	
defendant	Charles Stimac, Jr.	Shannon McNully		Clifford Law Offices			3128990900		
defendant	Charles Stimac, Jr.	Thomas A. Zimmerman, Jr.		Thomas A. Zimmerman, Jr. Attorney at attorneyzim.com	lom@attorneyzim.com		3124400020		
defendant	Equifax Credit Information Services, II	Benjamin C. Jensen		Robinson & Cole			8602758236	8602758299	Suite 1101; 222 Delaware Avenue; Wilmington, DE 19601
defendant	Equifax Credit Information Services, II	Shanti Mulpuru Katona		Polsinelli PC - DE			3022520924		
defendant	Equifax Health Services	Benjamin C. Jensen		Robinson & Cole			8602758236	8602758299	
defendant	Michael Kemp	Shane Fredrick Langston		Smith, Phillips, Mitchell & Scott	langstonlawyers.com	jaeson@langstonlawyers.com	6012534613		
defendant	Michael Kemp	Greta L. Kemp		Langston & Langston PLLC	langstonlawyers.com	shane@langstonlawyers.com	6012140025	6019691356	
defendant	Cliff Barbier	Joseph Richard Wetzel		Langston & Langston, PLLC					
defendant	Harold Boutin	Joseph Richard Wetzel		King & Spalding, LLP- SF CA			4153181200	4153181300	
defendant	Robert Friedrich	Joseph Richard Wetzel		King & Spalding, LLP- SF CA			4153181200	4153181300	
defendant	Shes Giesler	Joseph Richard Wetzel		King & Spalding, LLP- SF CA			4153181200	4153181300	
defendant	Mary Hannan	Joseph Richard Wetzel		King & Spalding, LLP- SF CA			4153181200	4153181300	
defendant	Vidya Sagar Jagadam	Joseph Richard Wetzel		King & Spalding, LLP- SF CA			4153181200	4153181300	
defendant	Susan Maudin	Joseph Richard Wetzel		King & Spalding, LLP- SF CA			4153181200	4153181300	
defendant	Graeme Payne	Joseph Richard Wetzel		King & Spalding, LLP- SF CA			4153181200	4153181300	
defendant	Lara Pearson	Joseph Richard Wetzel		King & Spalding, LLP- SF CA			4153181200	4153181300	
defendant	Joe Sanders	Joseph Richard Wetzel		King & Spalding, LLP- SF CA			4153181200	4153181300	
defendant	Richard F. Smith	Joseph Richard Wetzel		King & Spalding, LLP- SF CA			4153181200	4153181300	

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re: Equifax, Inc. Customer
Data Security Breach Litigation

MDL Docket No. 2800
No. 1:17-md-2800-TWT

This document relates to:
ALL CASES

Chief Judge Thomas W. Thrash, Jr.

~~PROPOSED~~ CASE MANAGEMENT ORDER NO. 3

On January 10, 2018, the Court entered Case Management Order No. 2 (ECF No. 87, “CMO-2”), governing various matters in this multidistrict proceeding until leadership appointments could be made. On February 9, 2018, the Court conducted a hearing on the Plaintiffs’ leadership applications for the Consumer Cases and the Financial Institution Cases and, on February 12, 2018, appointed a leadership structure on behalf of Plaintiffs in both tracks. By agreement of all counsel and for good cause shown, the Court amends certain provisions of CMO-2 as follows:

(1) Service of Complaints and Response Time.

The Parties agree and the Court orders that, for all current and future cases

filed in the Northern District of Georgia and transferred to this MDL, service of the complaints is deemed to be accepted and Defendant waives any and all service defects without any further process or request for waiver necessary on Plaintiffs' part. Defendant is not waiving any defense other than insufficient process and insufficient service of process (Rules 12(b)(4) and (5) of the Federal Rules of Civil Procedure), and Defendant expressly reserves all other defenses, including but not limited to any and all defenses related to jurisdiction and venue. Pursuant to CMO-2, Defendant's time to respond to any individual complaint is hereby suspended without date. Further in accordance with CMO-2, Plaintiffs will file their respective Master Consolidated Amended Complaints, which will supersede all earlier filed individual complaints, and Defendant's time to respond to such Master Consolidated Amended Complaints will be subject to the schedule set forth in section (2) below.

(2) Master Complaints for Each Track and Briefing on Rule 12(b)

Motions.

To facilitate handling of the litigation, the Court directs that Plaintiffs file Master Consolidated Amended Complaints in each track and that briefing on motions to dismiss such Complaints proceed separately according to the following schedule:

<u>Event</u>	<u>Consumer Track Deadline</u>	<u>Fin. Institutions Track Deadline</u>
Filing Master Complaints	May 13, 2018	May 30, 2018
Rule 12(b) motions	June 27, 2018	July 16, 2018
Plaintiffs' oppositions	August 13, 2018	August 30, 2018
Defendant's replies	September 12, 2018	October 1, 2018

(3) Communications with Putative Class Members.

In accordance with Local Rule 23.1(C)(2), the parties have met and conferred regarding whether proper management of the case or the interests of putative class members require the entry of an order limiting communications with putative class members. The parties are continuing to meet and confer and will report to the Court prior to the April 3, 2018 status conference as to whether they believe an order from the Court on this topic is necessary.

(4) CM/ECF Registration.

Pursuant to Case Management Order No. 1 ("CMO-1"), the Court has previously ordered all attorneys participating in this MDL proceeding to register with the Court's CM/ECF system. (Doc. No. 23, ¶ 1(b)). Having now completed the Initial Conference and appointed leadership, the Court orders that electronic

service of documents via the Court's CM/ECF system satisfies the obligations of service. Hereafter, unless otherwise ordered, neither the clerk's office nor counsel for the parties shall be obligated to provide service copies of any filings or related orders by U.S. Mail or any other means to attorneys who have not registered with the Court's CM/ECF system.

(5) Proposed Discovery Plan and Schedule.

The parties have exchanged drafts of a discovery plan under Rule 26(f), as well as a suggested schedule under Rule 16(b) for joinder of parties, consideration of any class action allegations, motions, and trial, and have begun the meet and confer process regarding those documents. The parties will present the Court with a discovery plan and proposed schedule by March 23, 2018.

(6) Other Provisions.

The parties shall adhere to all other aspects of CMO-1 and CMO-2. A Status Conference shall be conducted on April 3, 2018 at 10:00 a.m. EST in Courtroom 2108, United States Courthouse, 75 Spring Street, S.W., Atlanta, Georgia 30303. Liaison Counsel shall be responsible for making arrangements for others to monitor the conference by telephone. Pursuant to CMO-2, the parties shall continue to submit a joint agenda listing all matters to be considered no later than 2:00 p.m. two days before each status conference.

(7) Related Pro Se Cases.

The parties are aware of 20 *pro se* cases pending in the Northern District of Georgia which assert claims against Equifax relating to the data security incident. A list of the pending *pro se* cases is attached as Exhibit A. Some of these cases were originally filed in this Court, and others have been transferred to this Court by the JPML for consolidated or coordinated proceedings with the related actions in the MDL. Consistent with section (1) above, Defendant's time to respond to any individual complaint in the cases listed on Exhibit A, or in any other *pro se* cases that may be included in this proceeding, is suspended without date.

DATED: March 14, 2018

/s/ Amy E. Keller

Amy E. Keller
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*Consumer Plaintiffs' State Court
Coordinating Counsel*

-and-

/s/ Joseph P. Guglielmo (w/ permission)
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***Financial Institution Plaintiffs' Co-Liaison
Counsel***

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~~-and-~~

/s/ S. Stewart Haskins II (w/ permission)

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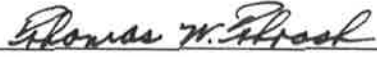
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SO ORDERED, this 20 day of March, 2018.



Thomas W. Thrash
United States District Judge

Exhibit A

Pro se Cases Pending in the Northern District of Georgia

- *Bussey v. Equifax Credit Bureau*, 1:17-cv-05197 (Thrash, J.)
- *Gay v. Equifax, Inc.*, 1:17-cv-05216 (Thrash, J.)
- *Gettino v. Equifax, Inc.*, 1:17-cv-04664 (Thrash, J.)
- *Griffin v. Equifax, Inc. et al.*, 1:17-cv-04663 (Thrash, J.)
- *Hogue v. Equifax, Inc.*, 1:17-cv-03781 (Thrash, J.)
- *Igein v. Equifax*, 1:17-cv-04056 (Thrash, J.)
- *Melton v. Equifax, Inc. et al.*, 1:17-cv-04523 (Thrash, J.)
- *Ray v. Equifax, Inc. et al.*, 1:17-cv-05272 (Thrash, J.)
- *Tomlinson v. Equifax Inc.*, 1:17-cv-05310 (Thrash, J.)
- *Williams et al. v. Equifax Inc. et al.*, 1:17-cv-04167 (Pannell, J.)
- *Breen v. Equifax Inc.*, 1:18-cv-00134 (Thrash, J.)
- *Day v. Equifax, Inc.*, 1:18-cv-00364 (Thrash, J.)
- *Coleman v. Equifax, Inc.*, 1:18-cv-00329 (Thrash, J.)
- *Strange v. Equifax Inc.*, 1:18-cv-00209 (Thrash, J.)
- *Kloewer v. Equifax, Inc.*, 1:18-cv-00208 (Thrash, J.)
- *Dash III v. Equifax Information Services LLC*, 1:17-cv-05529 (Thrash, J.)
- *Dash v. Equifax Information Services LLC*, 1:17-cv-5460 (Thrash, J.)
- *Brodsky v. Equifax Inc.*, 1:17-cv-05405 (Thrash, J.)
- *Riveles v. Equifax Information Services, Inc.*, 1:18-cv-00480 (Thrash, J.)
- *Leonardo v. Equifax Inc.*, 1:18-cv-00622 (Thrash, J.)